Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon-Virginia, Inc., and for	)	
Expedited Arbitration	)	

DIRECT TESTIMONY OF EDWARD J. CAPUTO
(Issues IV-8, IV-24, IV-80 and IV-81)

August 17, 2001

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INTRODUCTION

Q. Please state your name, title and address.

A. My name is Edward J. Caputo. I am Director of Operator and Directory Services for MCI WorldCom. My business address is 601 South 12th Street, Arlington, Virginia 22202.

Q. Please describe your professional experience and responsibilities at WorldCom.

A. I attended the University of Maryland in College Park, Maryland and earned a Bachelor of Science degree in Business Management. I am a candidate for a Master's degree in Telecommunications Management at George Washington University in Washington, D.C.

I have held management positions in the telecommunications field for the last 11 years. Prior to that I held management positions in the Information Technology and Finance field. I have had management responsibilities at WorldCom and its predecessor entity, MCI, since 1990 in the area of Operator and Directory Services.

Q. What is the purpose of your testimony.

A. The purpose of my testimony is to present WorldCom's position on issues related to the provision of Directory Assistance and Operator Services.

Issue IV-8

Should the Interconnection Agreement include terms setting forth Operator Services and Directory Assistance Trunking Arrangements? (Attachment IV, Sections 1.6 - 1.7.2; Sections 6 - 6.6)

Q. Please describe the Operator Services and Directory Assistance trunking arrangements proposed by WorldCom.

A. WorldCom has proposed contract terms for the establishment of separate trunk groups from WorldCom switches to Verizon's operator services and directory assistance platforms and also for the routing of Directory Assistance traffic over Local Interconnection Trunk Groups using NPA 555-1212. These terms should be included in the Interconnection Agreement so as to provide for a connection to Verizon's operator switch and directory assistance platform in the event WorldCom purchases Verizon's directory assistance and operator services for customers served by a WorldCom switch. This situation exists with respect to customers served off of certain switches of the former MFS, which are not yet connected to the WorldCom operator services or directory assistance platform.

WorldCom has also proposed terms addressing the situation in which it purchases Express Call Completion service from Verizon in conjunction with Directory Assistance or Operator Service. The terms provide for a one-way, out-going only trunk using MF signaling from WorldCom's switch to Verizon's operator switch. The proposed terms also specify that Verizon will provide WorldCom with the customer billing records necessary for WorldCom to bill its customers for these calls.

WorldCom has also proposed terms that provide for interconnection for the purpose of inward operator assistance so that WorldCom and Verizon operators may talk to one another when required to assist a caller of either party. Finally, the proposed terms also provide for the mutual exchange of Busy Line Verify/Busy Line Verify Interrupt inquiries over Local Interconnection Trunk Groups using network routable access codes published in the LERG. These latter terms allow the subscriber of either party to verify the status of a line and interrupt a call if necessary, such as in an emergency situation.

Q. Have you reviewed Verizon's response?

A. Yes. They do not provide any critique of our proposal. Instead, they merely assert that such arrangements should be in a separate agreement.

Issue IV-24

Should the Interconnection Agreement include detailed provisions regarding provision of Verizon's directory assistance database UNE to WorldCom, including the price of each directory assistance listing?(Attachment VIII, section 6.1.7.1)

Q. What is the directory assistance listing database?

A. The Directory Assistance Listing ("DAL") Database refers to the residential, business and Government subscriber records used by the incumbent local exchange carriers ("ILECs") to create and maintain databases for the provision of live and/or automated DA services. DAL data is information that enables telephone exchange carriers to swiftly and accurately respond to requests for directory information, including,

but not limited to, name, address, and phone numbers. MCIm seeks access to the DAL data that Verizon uses to provide directory assistance services to its subscribers in the State of Virginia. This includes the DAL data of all other LECs, competitive LECs ("CLECs") and independent telephone companies ("ITCs") that are directly inserted in Verizon's databases. Moreover, where a Verizon customer has requested a non-published number, MCIm seeks only access to the same data listing information that Verizon makes available to its operators to identify such listing. This includes sufficient information to identify the listing as non-published with which to file in MCIm's DAL database, specifically: name, address (if provided by the subscriber), locality name, NPA and NXX of the listing and an indication that the listing is non-published.

Q. How does MCIm currently receive access to the DAL database from Verizon?

A. Verizon currently provides a bulk download of its DAL database to WorldCom that contains listings throughout the former Bell Atlantic territory, through an electronic transfer, pursuant to a Directory Assistance License Agreement ("DAL Agreement") (attached hereto as Attachment EC-2) entered into by the parties on November 19, 1998. The DAL Agreement may expire on November 30, 2002 because Verizon has the option of not renewing the DA Agreement. WorldCom seeks to include in its Interconnection Agreement terms that will govern once the DAL Agreement expires. If this issue is not addressed through this proceeding, MCIm could be left without an agreement to get access to the DAL database after November 30, 2002– and after the opportunity to include this issue in the arbitration has passed.

Q. What is your understanding of the discussion of this issue which occurred at the FCC meditation session on August 7, 2001 to address this concern?

A. At the mediation session held on August 7, 2001, WorldCom proposed to amend the existing DAL agreement to address our concerns and to ensure MCIm's continued and uninterrupted ability to provide DA to its customers. In essence, WorldCom proposed that the DAL Agreement's term be extended to coincide with the term of the Interconnection Agreement currently being arbitrated. The proposed amendment is attached as Attachment EC-1.

Q. What is your expectation regarding Verizon's position on the proposed amendment?

A. I expect that Verizon will not accept the proposed amendment of the DAL Agreement because, pursuant to a Settlement Agreement between the parties, WorldCom cannot file any complaints or arbitrations regarding Verizon's provision of directory assistance data to WorldCom so long as Verizon complies with its obligations under the License Agreement. Because the proposed amendment suggests changes to the terms and conditions under which Verizon provides directory assistance data to WorldCom, I expect Verizon will not agree.

Q. Given Verizon's expected position, what action does WorldCom request from the Commission?

A. Assuming purely for the sake of argument that the Settlement Agreement prevents consideration of the Amendment to the License Agreement at this time, WorldCom

requests only that the Commission approve a sentence for inclusion in the Interconnection Agreement which incorporates the existing DAL License Agreement into the Interconnection Agreement by reference.

Q. What language do you propose?

A. I propose that the new Interconnection Agreement contain the same language as in the existing Interconnection Agreement at Attachment VIII, section 6.1.7.1, which incorporates the DA License Agreement by reference:

> Bell Atlantic will provide to MCIm, and MCIm will pay Bell Atlantic for, directory assistance data at the rate and under the terms and conditions set forth in the Directory Assistance License Agreement executed by the Parties on November 19, 1998, and as may be subsequently amended by the Parties.

Q. Is this the same action requested by WorldCom in the Statement of Unresolved Issues, prior to the mediation of this issue?

A. Yes it is.

Q. What are your concerns if the Commission does not address access to Verizon's DAL database in this proceeding?

A. MCIm is particularly concerned that it continue to receive nondiscriminatory access to the DAL data as required by the Act. Specifically, it is important that MCIm receive nondiscriminatory access to the DAL data as a UNE . A Commission Order that

Verizon must continue to provide the DAL database consistent with the Act will ensure MCIm's continued and uninterrupted ability to provide DA to its customers. Congress and the FCC have properly recognized that complete and accurate DAL data is not necessarily readily available from other sources. The obligation to provide DAL, therefore, should not cease when an appendix or an agreement expires. To allow this to happen would jeopardize MCIm's ability to provide service while new terms and conditions are being negotiated – if agreement is reached at all. This would place Verizon at an enormous negotiating and competitive advantage.

Q. Is DAL database an unbundled network element ("UNE")?

A. Yes it is. In its Response, Verizon has misstated its obligations pursuant to the Telecommunications Act regarding the provision of Directory Assistance. It is clear that the DAL database is a UNE. The FCC determined that the DAL database is a UNE under Section 251(c)(3) in its Local Competition First Report & Order. As such, Verizon is obligated to provide nondiscriminatory access to the DAL database . Furthermore, because Section 251(c)(3) of the Act states UNEs may be used by any telecommunications carrier to provision a telecommunications service, Verizon may not impose any restrictions on how MCIm uses the DAL data.

In the UNE Remand Order, the FCC in a section titled "Network Elements that Must be Unbundled" specifically stated, "LEC's must also offer unbundled access to call-related databases, including but not limited to, the Line Information database (LIDB), Toll Free Calling database, Number Portability database, Calling Name (CNAM) database, Operator Services/Directory Assistance databases. . . ." UNE Remand Order at

¶19. The FCC in that Order did not remove DAL databases from the list of UNEs. Additionally, the Commission's Local Competition Order defined call-related databases as "databases, other than operations support systems, that are used in signaling networks for billing and collection or the transmission, routing, or other provision of telecommunications service." Local Competition Order at n. 1126. See also FCC UNE Remand Order ¶ 403 (emphasis added).

Q. Pursuant to the dialing parity sections of the Act, does Verizon have other obligations with respect to providing access to its DAL database ?

A. Verizon also has certain obligations pursuant to the dialing parity requirements of the Act. Section 251 (b)(3) requires all LECs to provide nondiscriminatory access to DAL data to one another. This is in addition to the duties imposed under the UNE provisions of the Act. The FCC's rulings have been clear that whether these issues are decided under a UNE analysis or under dialing parity, the results are similar. Because the ILEC has control of the subscriber service orders upon which the listings are based-- which is the only reliable source of information to provide directory assistance-- they have the duty to provide nondiscriminatory access. In order to compete effectively, competing LECs must be allowed nondiscriminatory access to DAL, without anti-competitive and discriminatory use restrictions.

The Act's UNE provisions require LECs to allow nondiscriminatory access and CLECs may use UNEs to provide any telecommunication service they wish with that UNE. Because MCIm may use the data for any telecommunications service, it may use

the DA database to provide services including, but not limited to, local and long distance Directory Assistance services.

Q. How has the FCC interpreted "nondiscriminatory access"?

A. The FCC has interpreted "nondiscriminatory access" as requiring all LECs to provide to all qualified competitors such as MCIm, the same DAL information they use. In the Local Competition Third Report & Order, ¶ 129 (1999), the FCC stated that, "Because an incumbent LEC would have the incentive to discriminate against competitors by providing them with less favorable terms and conditions that it provides to itself, we conclude that the term "nondiscriminatory", as used throughout section 251, applies to the terms and conditions an incumbent LEC imposes on third parties as well as on itself."

Q. Please summarize your testimony.

A. Given the legal obligations of Verizon to provide DAL as a UNE and the great competitive disadvantage MCIm would face if its DAL Agreement expires on November 30, 2002, and there is no provision for obtaining DAL in place after that date, this Commission should require that Verizon continue to provide the DAL database as a UNE to MCIm. The Commission should adopt MCIm's proposed language for the interconnection agreement which incorporates by reference the existing DAL agreement between Verizon and MCIm. The terms and conditions under which Verizon provides unbundled network elements are to be reflected in the Interconnection Agreement pursuant to Section 251 (c)(1)—and the incorporation by reference proposed herein will

satisfy that requirement.

Issue IV-80

Should the Interconnection Agreement contain provisions regarding Directory Assistance Service? (Attachment VIII, Sections 6.1.3 through 6.1.3.3.5).

Issue IV-81

Should the Interconnection Agreement contain provisions regarding Operator Services ("OS")? (Attachment VIII, Sections 6.1.4 through 6.1.4.10).

Q. Please describe the issue in dispute.

A. The issue presented here is whether Verizon is required to provide WorldCom with Operator Services (OS) and Directory Assistance (DA) as Unbundled Network Elements. The FCC has ruled that OS/DA must be provided as UNEs until Verizon establishes that it provides customized routing of WorldCom's customers' Operator Services and Directory Assistance calls to the Feature Group D ("FGD") trunks designated by WorldCom.[1] WorldCom has proposed that directory assistance and

[1] OS/DA are services that support operator call completion and the ability of MCIm to provide directory assistance services to its customers. Operator Services refer to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call. Specifically, ILECs must allow telephone service customers to connect to the operator services offered by that customer's chosen local service provider by dialing "0" ("0-") or "0" plus the desired telephone number ("0+"), regardless of the identity of the customer's local telephone service provider.

Directory Assistance refers to a service in which users are provided with telephone numbers and, in some instances, addresses of individual telephone exchange service subscribers. The information provided to users is obtained from databases that contain the names, addresses, and telephone numbers of the telephone exchange service subscribers within particular geographic areas that do not elect to have unpublished numbers.

operator service are available on an unbundled basis until Verizon provides customized routing that meets FCC requirements and WorldCom's needs.

Q. What is Verizon's position?

A. In its Response to Statement of Unresolved Issues Verizon asserted that operator services and directory assistance are not unbundled elements because customized routing is available. Although the matter has not been closed as yet between the parties, it is WorldCom's understanding that Verizon believes it can satisfy the Commission's requirements and WorldCom's needs with respect to customized routing.

Q. Is part of the dispute a question regarding the timing of the provision of DA/OS as UNEs and the provision of customized routing?

A. Verizon must provide OS/DA as a UNE until it demonstrates compliance with the FCC's Rule 319 Remand Order requiring provision of customized routing. (Third Report and Order, FCC 99-238, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket 96-98, rel. November 5, 1999.) Because Verizon has not yet demonstrated compliance with the order, it must provide OS/DA as a UNE. In its UNE Remand Order, the FCC expressly ruled that:

> [I]f an incumbent LEC does not provide customized routing to requesting carriers that use the incumbent's unbundled local switching element, it must provide unbundled access to its OS/DA service.

Q. What is WorldCom's proposal?

A. Testing should be performed to establish whether Verizon is providing customized routing that meets WorldCom's routing and signaling needs. Specifically, testing should be performed to demonstrate whether Verizon is successfully routing WorldCom's OS/DA traffic to WorldCom's OS/DA platform using a compatible signaling protocol and without requiring WorldCom to install additional unnecessary trunking. Until that demonstration occurs, DA and OS should be provided on an unbundled basis. Once that demonstration is made, the Interconnection Agreement can be amended to reflect that OS and DA are no longer available as unbundled network elements.

Q. Is similar testing occurring anywhere?

A. Yes. Such testing is currently taking place between SBC and WorldCom. WorldCom expects the testing to conclude successfully and believes that if SBC can provide the customized routing required by WorldCom that Verizon can do so as well.

Q. Why is the provision of satisfactory customized routing important?

A. As the FCC has said "[i]n instances where the requesting carrier obtains the unbundled switching element from the incumbent, the lack of customized routing effectively precludes requesting carriers from using alternative OS/DA providers and, consequently, would materially diminish the requesting carrier's ability to provide the services it seeks to offer." Rule 319 Remand Order ¶ 463. Therefore, ILECs must

provide OS/DA as a UNE "to the extent they have not accommodated technologies used for customized routing."

Q. What customized routing does WorldCom require to provide OS/DA services effciently?

A. WorldCom requires Verizon to route WorldCom's OS/DA traffic, using switch software features, to existing shared access, Feature Group D trunks on WorldCom's Long Distance Network. Verizon's switch will translate each WorldCom customer's 411 or 555-1212 call into a new 10-digit number that Verizon will route like any other long distance call it sends to WorldCom's long distance, FGD trunks. Similar methods will be used to translate WorldCom's customers 0+ and 0- calls and route them to WorldCom's long distance network. Verizon will perform the switching functions and translations necessary to support this routing. Verizon will then send these WorldCom calls, along with all other WorldCom long distance calls (customer-originated 1+ calls where the WorldCom customer is PIC'd to WorldCom) to WorldCom's existing FGD trunks. The switch will read the new 10-digit number as a 1+ call that goes to WorldCom as the customer's PIC'd long distance carrier, and will send it to WorldCom's appropriate FGD trunk group. This is a very efficient method of routing for WorldCom, which has established FGD trunk groups currently sending Long Distance traffic from Verizon's local switches.

Q. Is WorldCom's proposal consistent with the Commission's description of customized routing in the UNE Remand Order?

A. Yes, WorldCom's request that its DA/OS traffic be routed to FGD trunks designated by WorldCom is consistent with the FCC's ruling in the UNE Remand Order that the requesting CLEC may designate the trunks to which the ILEC must route the OS/DA traffic:

> Customized routing permits requesting carriers to designate the particular outgoing trunks associated with unbundled switching provided by the incumbent, which will carry certain classes of traffic originating from the requesting provider's customers. This feature would allow the requesting carrier to specify that OS/DA traffic from its customers be routed over designated trunks which terminate at the requesting carrier's OS/DA platform or a third party's OS/DA platform.

UNE Remand Order at n 867.

Q. Has WorldCom tested this customized routing?

A. Yes, WorldCom has performed exhaustive testing of customized routing using switches from Nortel, Lucent, and Siemens that WorldCom has in its own laboratories. WorldCom researched the documentation that these vendors supply to determine whether capabilities exist within their switches to support customized routing. These tests prove conclusively that it is technically feasible to perform customized routing using FGD signaling with the necessary translations, as described herein.

Q. Has WorldCom performed customized routing of DA traffic previously?

A. WorldCom has performed customized routing to support delivery of local Directory Assistance traffic to WorldCom's own operator platform using FGD signaling on both Nortel and Siemens local switches since September 1997. Lucent 7RE and 5ESS local switches have had the capability to route directory and operator assisted calls along two distinctly different routing paths since the 5E12 software release. This release was available fourth-quarter 1997 through feature SFID 269, also known as 99-CP-4031. Nortel provides this capability through routing tables in their switches. Siemens provides additional capabilities in this regard as described in Bulletin 99-PB-06 issued March 1999, called "Overview of EWSD Unbundling and Interconnection features in support of the Multi Service Provider Environment." WorldCom's test of customized routing uses these switch features and functions.

Q. Please describe the routing of OS/DA traffic using customized routing.

A. WorldCom should have the option of having OS/DA traffic delivered to its OS/DA platforms in one of two ways. First, in the scenario described above, Verizon would route WorldCom's OS/DA traffic to WorldCom's existing FGD, long distance trunks directly from Verizon's end office. Alternatively, Verizon should transport this traffic via shared transport, to its tandem, at which point the traffic would be routed to WorldCom FGD trunks. This latter option would be used where WorldCom does not interconnect for long distance service at an end office.

Q. Why is this routing important?

A. For WorldCom to provide its own operator services and directory assistance (OS/DA) service efficiently for its customers served by unbundled switching, WorldCom must be able to minimize trunking expense. The first routing option described above serves this purpose where WorldCom's long distance network currently interconnects with Verizon end offices. The second approach -- receiving OS/DA traffic over shared transport via a Verizon tandem -- is an efficient method where WorldCom does not interconnect at an end office. The use of shared transport is an important aspect of effective customized routing because without shared transport, WorldCom would be required to lease new dedicated trunk groups from every Verizon end office serving its customers, which would be prohibitively expensive and grossly inefficient. To deliver OS/DA traffic via shared transport, Verizon must provide Feature Group D signaling from the point of origination (that is, at the Verizon end office providing the unbundled switching).

Q. Is the provision of Feature Group D signaling technically feasible?

A. FCC rules provide that ILECs must provide "all technically feasible transmission facilities, features, functions, and capabilities that the requesting telecommunications carrier could use to provide telecommunications services." 47 C.F.R. § 51.319(d)(2)(B). It is technically feasible for Verizon to provide Feature Group D OS/DA signaling protocol at its end offices so that OS/DA signaling can be sent to WorldCom's designated Feature Group D trunks.

In its UNE Remand Order, the FCC ruled that provision of customized routing includes accommodating CLECs' needs for FGD signaling and all necessary switch

translations. Pursuant to the UNE Remand Order, ILECs must provide requesting CLECs with customized routing to CLEC-designated FGD trunks. If an ILEC does not do so, and until it does, the CLEC is entitled to receive OS and DA as a UNE. The FCC ordered as follows:

> We agree that customized routing is necessary to access alternative sources of OS/DA for competitors not deploying their own switches. Commenters state that a key component of providing carriers with a choice of competitive OS/DA suppliers is the availability of line class codes in the unbundled switching elements. Lack of a customized routing solution that enables competitors to route traffic to alternative OS/DA providers would therefore effectively preclude competitive LECs from using such alternative providers. Thus, if an incumbent LEC does not provide customized routing to requesting carriers that use the incumbent's unbundled switching element, it must provide unbundled access to its OS/DA service. . . According to MCI WorldCom, to use the incumbent LECs' signaling protocol instead of Feature Group D, most competitive LECs would have to either deploy new customized operator platforms or modify their existing platforms, both of which would impose substantial costs. SBC responds that the customized routing of Feature Group D is not technically feasible in all end-office switches. BellSouth, however, offers a technical solution to MCI WorldCom's concern in some of its offices and states its willingness to deploy these solutions throughout its network. In instances where the requesting carrier obtains the unbundled

switching element from the incumbent, the lack of customized routing effectively precludes requesting carriers from using alternative OS/DA providers and, consequently, would materially diminish the requesting carrier's ability to provide the services it seeks to offer. Thus, we require incumbent LECs, to the extent they have not accommodated technologies used for customized routing, to offer OS/DA as an unbundled network element.

UNE Remand Order at 462-463.

FCC regulations also require Verizon to provide any technically feasible customized routing functions. 47 C.F.R. § 51.319 (c)(1)(A)(iii)(2). The customized routing solution should provide WorldCom with a non-discriminatory and efficient method for bringing the OS/DA traffic to WorldCom's OS/DA platform.

Q. Does Verizon's customized routing meet WorldCom's needs and satisfy the requirements set forth by the Commission?

A. Although Verizon purports to offer customized routing of OS/DA calls, to date it has not established that it provides customized routing to the FGD trunks designated by WorldCom. Routing to FGD trunks is necessary so that WorldCom can identify the callers using its OS/DA services and bill them appropriately. Without a compatible signaling protocol, WorldCom cannot offer its OS/DA service to customers it serves via Verizon unbundled switching. Therefore, Verizon should be required to provide OS/DA as a UNE until it establishes that it offers customized routing which meets WorldCom's needs.

Q. How should this issue be resolved?

A. The Commission should require Verizon to offer OS/DA to WorldCom as UNEs until it establishes that it provides customized routing as described herein.[2] WorldCom further recommends that the Commission make specific orders requiring Verizon and WorldCom to work in collaboration to jointly engineer and implement a customized routing solution that will meet WorldCom's requirements for routing to WorldCom's

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[2] WorldCom has proposed detailed terms covering provision of the Directory Assistance UNE. These provisions cover the following areas: routing of Directory Assistance calls; requirement that WorldCom subscribers have the ability to dial the same telephone numbers for access to the Directory Assistance platform; requirement that WorldCom give Verizon notice of intent to change to another Directory Assistance platform; requirement that Verizon provide WorldCom and WorldCom subscribers Directory Assistance at Parity and in accordance with industry standards; the requirement that service levels comply with applicable state regulatory requirements; provisions regarding the provision of specialized routing for branded Directory Assistance; and the minimum Directory Assistance capabilities available to WorldCom's subscribers.

Similarly, WorldCom has proposed detailed terms covering provision of the Operator Services UNE. These provisions cover the following areas: the requirement that Verizon provide routing of 0+ local, 0- and operator transfers for local Operator Services calls dialed by WorldCom subscriber to either the WorldCom OS platform or the Verizon OS platform as specified; requirement that WorldCom subscribers be provided the ability to dial the same telephone numbers as Verizon subscribers to reach OS; the requirement that WorldCom give notice to Verizon before terminating an arrangement to route OS to Verizon's OS platform; the requirement for Verizon to give WorldCom subscribers OS enhancements at Parity on a Non-Discriminatory basis; provisions regarding specialized routing for branded OS; minimum requirements for OS capabilities provided to WorldCom subscribers at Parity; provisions regarding fraud control; provisions regarding billed number screening; provisions regarding referrals of subscriber account inquiries; requirement that Verizon permit WorldCom to connect its local OS to Verizon's Line Status Verification and Call Interrupt to enable WorldCom to perform Busy Line Verification/Busy Line Interrupt services and requirements thereunder; and the requirements for BLV/BLI requests for ported numbers.

Many of these provisions were negotiated and agreed to by Verizon and WorldCom in 1997 or were arbitrated by the Virginia State Corporation Commission for inclusion in the current contract. These provisions are included in the current contract which was approved by the Virginia State Corporation Commission and are appropriate for inclusion in the new contract until Verizon demonstrates that it is providing customized routing as described herein.

designated FGD trunk groups. The Commission should require the parties to provide status reports to the Commission staff on a monthly basis so that staff can monitor the progress of this effort. In the interim period, the Commission should require Verizon to provide OS/DA services to WorldCom as an unbundled network element, as prescribed in the UNE Remand Order.

Q. Does WorldCom have contract language to propose that will address this issue?

A. Yes, WorldCom has proposed the following contract language which Verizon was to consider and which we urge the Commission to adopt:

> Where Verizon has deployed an AIN capability that allows routing of OS/DA calls to MCIm's FGD trunks, or where Verizon uses existing switch features and functions to route OS/DA calls to MCIm's FGD trunks, Verizon shall provide customized routing of OS/DA calls placed by MCIm customers to the particular outgoing trunks and associated routing tables designated by MCIm, using FGD protocol, including trunks terminating at OS/DA platforms designated by MCIm. Where Verizon has not deployed such AIN capability and has not used such existing switch features, Verizon shall provide OS/DA services to MCIm as unbundled network elements. In that instance, upon request by MCIm, the Parties shall negotiate the terms, conditions, and cost-based rates for providing OS/DA services as unbundled network elements.
>
> Where Verizon provides OS/DA services to MCIm on a resale basis, Verizon shall provide such services at Parity and on a non-discriminatory basis.

Q. Does this conclude your testimony?

A. Yes it does.